

EXHIBIT

2

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

NICOLE WOOTEN,

Plaintiff,

v.

LIMETREE BAY TERMINALS d/b/a
OCEAN POINT TERMINALS, PORT
HAMILTON REFINING AND
TRANSPORTATION, and WEST
INDIES PETROLEUM, LTD.,

Defendants.

Case No. 1:23-CV-00012

ACTION FOR DAMAGES

JURY TRIAL DEMANDED

NOTICE OF INTENT TO SERVE SUBPOENA DUCES TECUM

COME NOW Plaintiff, by and through the undersigned counsel, and hereby file her Notice of Intent to Serve a Subpoena Duces Tecum and Notice of Subpoena Duces Tecum upon Total Safety Virgin Islands LLC, at Dudley Newman Feuerzeig LLP, 1131 King Street, Suite 204, Christiansted VI 00820.

RESPECTFULLY SUBMITTED
LEE J. ROHN AND ASSOCIATES, LLC
Attorneys for Plaintiff

DATED: June 30, 2025

BY: /s/ Lee J. Rohn

Lee J. Rohn, Esq.
VI Bar No. 52
1108 King Street, Suite 3 (mailing)
56 King Street, Third Floor (physical)
Christiansted, St. Croix
U.S. Virgin Islands 00820
Telephone: (340) 778-8855
Lee@rohnlaw.com



Exhibit A**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

NICOLE WOOTEN,

Plaintiff,

v.

LIMETREE BAY TERMINALS d/b/a
OCEAN POINT TERMINALS, PORT
HAMILTON REFINING AND
TRANSPORTATION, and WEST
INDIES PETROLEUM, LTD.,

Defendants.

Case No. 1:23-CV-00012

ACTION FOR DAMAGES**JURY TRIAL DEMANDED****NOTICE OF SUBPOENA DUCES TECUM****RECORDS DELIVERY ONLY. NO ORAL TESTIMONY WILL BE TAKEN****TO: Total Safety Virgin Islands LLC****Resident Agent for Service: Dudley Newman Feuerzeig LLP
1131 King Street, Suite 204
Christiansted VI 00820**

PLEASE TAKE NOTICE that, pursuant to Rules 26, 30, and 45 of the Federal Rules of Civil Procedure, you are commanded to produce all requested documents in your possession, custody or control to **Lee J. Rohn and Associates, LLC, 1108 King Street, Suite 3 (mailing)/56 King Street, Third Floor (physical), Christiansted, St. Croix 00820**, within twenty (20) days from the date of service of the attached Subpoena or on or before **July 21, 2025 at 5:00 p.m. AST.**

1. All documents related to the incident of smoldering coke on or about July and August through December 2022, including but limited to emails, texts, notes, meeting minutes, memorandums, contracts related to the work being



Wooten, Nicole v. Limetree Bay Terminals, et. al., Case No. 1:23-CV-00012
NOTICE OF SUBPOENA DUCES TECUM
Page 2

done, all records related to air quality monitoring, all instructions/directives related to air quality monitoring, and the complete billing record for the work done at the incident.

These items will be inspected and may be copied at that time. You will not be required to surrender the original items. **You may comply with this subpoena by giving legible copies of the items to be produced to the attorney whose name appears on this subpoena on or before the scheduled date of production. You may produce electronic copies of any documents which are responsive to this subpoena.** You may condition the preparation of the copies upon the payment in advance of the reasonable cost of preparation. **You may mail or deliver the copies to the attorney whose name appears on this subpoena and thereby eliminate your appearance at the time and place specified above.** You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena.

If you fail to:

- (a) appear as specified; or
- (b) furnish the records instead of appearing as provided above; or
- (c) object to this subpoena you may be in contempt of Court.

You are subpoenaed by the attorney whose name appears on the subpoena and, unless excused from the subpoena by the attorney or the Court, you shall respond to the subpoena as directed.

Wooten, Nicole v. Limetree Bay Terminals, et. al., Case No. 1:23-CV-00012

NOTICE OF SUBPOENA DUCES TECUM

Page 3

RESPECTFULLY SUBMITTED
LEE J. ROHN AND ASSOCIATES, LLC
Attorneys for Plaintiff

DATED: June 30, 2025

BY: /s/ Lee J. Rohn

Lee J. Rohn, Esq.

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